

April 13, 2020

James D. Fielder, Jr., Ph.D.  
Secretary of Higher Education  
Maryland Higher Education Commission  
Division of Collegiate Affairs  
6 N. Liberty Street, 10th Floor  
Baltimore, MD 21201

RE: Objection to MUIH Proposal to Offer Cannabis Post-Baccalaureate Certificate

Dear Secretary Fielder:

We have been informed by the Maryland Higher Education Commission (MHEC) that the Maryland University of Integrative Health (MUIH) has applied for approval to develop a Post-Baccalaureate Certificate (PBC) in Cannabis Science: Therapeutics, Product Design, and Quality Assurance. While we understand MUIH's vision to expand its educational offerings into the topic of medical cannabis, the University of Maryland Baltimore (UMB) School of Pharmacy's Master of Science in Medical Cannabis Science and Therapeutics program objects to MUIH's program based on the following considerations.

### **1. Unreasonable Program Duplication**

The MUIH proposal states that what makes their content unique is the “overarching focus on herbal medicine.” However the program and courses are titled to suggest a specific focus on medical cannabis that is similar to our UMB program, for instance their stated “major areas of focus” in Section D (Reasonableness of Program Duplication), as well as the first bullet point in their stated content “unique to MUIH” in the table provided in Section D. Four of the six courses in MUIH's program are extremely similar in content to courses and content taught in our program at UMB, teaching the endocannabinoid system, cannabis therapeutics, product formulation, and academic research.

### **2. Competitive Target Audience**

Our concern is that similarity between the two programs would diminish the number of students applying to the UMB Graduate Program in Medical Cannabis Science and Therapeutics. The UMB School of Pharmacy is submitting a proposal for three graduate certificates based on courses already developed for our medical cannabis

Master's program. Like UMB, MUIH states that their program is designed to be accessible to students with or without a background in science or medicine. The UMB School of Pharmacy seeks a diverse student body that includes a variety of academic and professional backgrounds, including health professionals, scientists, public health professionals, business professionals, and others with a stated interest in a career medical cannabis industry. Likewise, MUIH states that their program is intended for those "seeking an initial career in the cannabis industry or looking to expand their job options within the field," as well as "conventional and integrative health practitioners." Like our proposed graduate certificate programs, the MUIH PBC is intended to be entirely online.

### **3. Inconsistent Allowable Content**

The two courses in MUIH's program that are unique ("Cannabis Dispensary Practices" and "Quality Assurance in Cannabis Products") seemingly teach content that UMB was prohibited from including in our original proposal by the Maryland Office of the Attorney General (OAG), with whom we consulted prior to submitting our proposal to MHEC. Specifically, the OAG shared with us concerns that if business management curriculum content is specific to a medical cannabis business, as opposed to a generic small business, or a small pharmacy business, the curriculum would cross the line to aiding and abetting felony under federal law or illegal practices in states where medical cannabis has not been legalized. As such we were required to remove all mention of such content in our proposed curriculum prior to submitting our MS program proposal to MHEC. Allowing MUIH to develop a program that includes such content despite the instructions given by the OAG could unfairly draw students interested in business development away from UMB's program.

We respectfully ask MHEC to reconsider MUIH's proposal to develop a PBC based on the above concerns.

Regards,

A handwritten signature in black ink, appearing to read "Roger J. Ward", with a stylized flourish at the end.

Dr. Roger J. Ward, JD, MSL, MPA  
Interim Provost and Executive Vice President  
Dean, Graduate School